

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

BROOKE RYAN, individually and on	:	
	:	
behalf of all others similarly situated,	:	
	:	
Plaintiff,	:	No. 20-cv-02164-JMG
	:	
v.	:	CLASS ACTION
	:	
TEMPLE UNIVERSITY,	:	
	:	
Defendant.	:	
	:	
CHRISTINA FUSCA, individually and on	:	
behalf of all others similarly situated,	:	
	:	
Plaintiff,	:	No. 20-cv-03434-JMG
	:	
v.	:	CLASS ACTION
	:	
TEMPLE UNIVERSITY,	:	
	:	
Defendant.	:	
	:	

**STIPULATION AND PROPOSED ORDER REGARDING
EXTENSION OF TIME TO FILE ANSWER**

WHEREAS, in an August 11, 2023 opinion, the United States Third Circuit Court of Appeals reversed the decision from this Court that granted Temple University's Rule 12(b)(6) motion to dismiss;

WHEREAS, the mandate was issued on September 6, 2023;

WHEREAS, Temple University's answer to the Plaintiffs' Consolidated Second Amended Class Action Complaint (the "Complaint") is due on September 27, 2023, twenty-one days after the mandate was issued; and

WHEREAS, no prior extensions of time to answer the Complaint have been sought by Temple.

IT IS HEREBY STIPULATED AND AGREED, by and between the undersigned counsel for the parties, and SUBJECT TO THE APPROVAL OF THE COURT, as follows:

Temple University shall have a one-week extension, until October 4, 2023, to file its answer to the Complaint.

Dated: September 12, 2023

Respectfully submitted,

/s/ Stuart A. Carpey
Stuart A. Carpey
CARPEY LAW, P.C.
600 W. Germantown Pike, Suite 400
Plymouth Meeting, PA 19462
Tel: 610-834-6030
scarpey@carpeylaw.com

Roy T. Willey, IV
POULIN WILLEY ANASTOPOULO, LLC. *Attorney for Plaintiff Christina Fusca*
32 Ann Street
Charleston, SC 29403
Tel: 843-614-8888
roy@akimlawfirm.com

Attorneys for Plaintiff Brooke Ryan

/s/ Roberta D. Liebenberg

Roberta D. Liebenberg
Gerard A. Dever
Jessica D. Khan
FINE, KAPLAN AND BLACK, R.P.C.
One South Broad Street, 23rd Floor
Philadelphia, PA 19107
Tel: 215-567-6565
Fax: 215-568-5872
rliebenberg@finekaplan.com

Attorneys for Defendant Temple University

So Ordered this _____ day of _____, 2023.

Honorable John M. Gallagher
United States District Court Judge